

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Wisconsin

United States of America )  
v. )  
Darnell Daniels (DOB: XX/XX/1983) ) Case No. 22 MJ 70  
)  
)  
)  
)  
)  
\_\_\_\_\_  
Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 29, 2022 in the county of Milwaukee in the  
Eastern District of Wisconsin, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. 841(a)(1) and 841(b)(1) (B)	possession with the intent to distribute a controlled substance unlawful possession of ammunition by a prohibited person
18 U.S.C. 922(g)(1)	

This criminal complaint is based on these facts:

See the attached affidavit.

Continued on the attached sheet.

**JOSH EAGEN** Digitally signed by JOSH EAGEN  
Date: 2022.03.30 19:20:52 -05'00'

*Complainant's signature*

Joshua Eagen, Special Agent (FBI)

*Printed name and title*

Sworn via telephone; transmitted via email  
pursuant to Fed. R. Crim. 4.1

Date: 03/30/2022

  
*Judge's signature*

City and state: Milwaukee, Wisconsin

William E. Duffin, United States Magistrate Judge

*Printed name and title*

## **AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Joshua Eagen, being first duly sworn, hereby depose and state as follows:

### **INTRODUCTION**

1. I make this affidavit in support of an application for a criminal complaint and arrest warrant for DARNELL DANIELS (DOB: XX/XX/1983) for violations of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 922(g)(1).

### **BACKGROUND AND EXPERIENCE**

2. I am a Special Agent with the Federal Bureau of Investigation and have been since March 2020. Since that time, I have gained experience and insight into the investigation, apprehension, and prosecution of individuals involved in federal criminal offenses, the means by which those individuals commit those offenses, and the tools available to law enforcement to further such investigations.

3. As a federal law enforcement officer, I have participated in the investigation of narcotics-related offenses, resulting in the prosecution and conviction of numerous individuals and the seizure of illegal drugs, weapons, drug proceeds, and other evidence of criminal activity. As a narcotics investigator, I have interviewed individuals involved in drug trafficking and have obtained information from them regarding the acquisition, sale, importation, manufacture, and distribution of controlled substances. Through my training and experience, I am familiar with actions, habits, traits, methods, and terminology used by the traffickers and abusers of controlled substances. I have participated in all aspects of drug investigations, including physical surveillance, execution of search warrants, undercover transactions, court-ordered wiretaps, analysis of phone and financial records, and arrests of numerous drug traffickers. I have also spoken on numerous occasions with other experienced narcotics investigators concerning the methods and practices of drug traffickers and money launderers. Through these investigations, my training and experience, and conversations with other law enforcement personnel, I have become familiar with the methods used by drug traffickers to manufacture, smuggle, safeguard, and distribute narcotics, and to

collect and launder trafficking-derived proceeds. I am further aware of the methods employed by major narcotics organizations to thwart any investigation of their illegal activities.

4. This affidavit is based upon my personal knowledge and upon information reported to me by other federal, state, and local law enforcement officers during the course of their official duties, all of whom I believe to be truthful and reliable. Throughout this affidavit, I refer to case agents. Case agents are those federal, state, and local law enforcement officers who have directly participated in this investigation, and with whom I have had regular contact regarding this investigation.

5. This affidavit is submitted for the limited purpose of establishing probable cause for the issuance of a criminal complaint against DARNELL DANIELS for violations of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 922(g)(1).

### **PROBABLE CAUSE**

6. I am participating in an investigation led by the Federal Bureau of Investigation (FBI), Brown County Drug Task Force (BCDTF), Drug Enforcement Agency (DEA), Wisconsin Department of Justice Division of Criminal Investigation (DCI), and Milwaukee High Intensity Drug Trafficking Area (HIDTA) targeting a drug trafficking conspiracy involving Darnell NMI DANIELS, a.k.a. "Paper" or "Pape," and others known and unknown for the distribution of controlled substances, the possession of controlled substances with intent to distribute, the unlawful use of communication facilities to commit a felony drug crime, a conspiracy to distribute and possess with the intent to distribute controlled substances, and money laundering, all in the Eastern District of Wisconsin. This drug trafficking organization is responsible for the distribution of cocaine, cocaine base, methamphetamine, and marijuana in the Eastern District of Wisconsin—in both Green Bay and Milwaukee.

7. On March 28, 2022, the Honorable James R. Sickel, United States Magistrate Judge of the Eastern District of Wisconsin, issued a warrant authorizing the search of Darnell DANIELS's residence located at 3302A East Bottsford Avenue, Cudahy, Wisconsin 53110.

8. On March 29, 2022, case agents executed the warrant at Darnell DANIELS's residence located at 3302A East Bottsford Avenue, Cudahy, Wisconsin 53110.

9. During that search, case agents located Darnell DANIELS inside of the residence, along with DANIELS's two minor children. Case agents recovered a box of Sig Sauer 9mm hollow-point ammunition, a black Glock extended magazine with 29 cartridges, \$915 in United States currency, a gold chain reportedly worth approximately \$10,000, a box of sandwich bags, and a drawstring bag containing suspected cocaine with a gross, packaged weight of 1,111 grams and a black Weighmax scale. That substance field tested positive for cocaine.

10. Based on a review of publicly-available court records, I know that Darnell DANIELS has previously been convicted of second-degree recklessly endangering safety, a felony, in violation of Wisconsin Statute 941.30(2), in Milwaukee County Case Number 2002CF003051, and therefore is prohibited from possessing firearms and ammunition, in violation of Title 18, United States Code, Section 922(g)(1).

### **CONCLUSION**

11. Based on the above information and facts, I submit that there is probable cause to believe that DARNELL DANIELS possessed with intent to distribute a mixture and substance containing more than 500 grams of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and unlawfully possessed ammunition as a prohibited person, in violation of Title 18, United States Code, Section 922(g)(1).